

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-v-

ROBERT J. MUELLER et al.,

Defendants,

- and –

DEEPROOT TECH LLC et al.,

Relief Defendants,

Case No. 5:21-cv-785-XR

**THIRD PARTY SILICON DRIVE OFFICE VENTURE, LLC'S MOTION FOR
PERMISSION TO ACCESS LEASED FACILITIES**

Third Party Silicon Drive Office Venture, LLC (“SDOV”), the owner of the building where Defendant deeproot Capital Management, LLC (“Deeproot”) leases space for its operations (the “Leased Space,” which includes all space that Deeproot has leased from SDOV), respectfully moves for permission to access the Leased Space for purposes of showing the space to prospective buyers. SDOV is currently trying to sell the building. A prospective buyer has asked to enter and inspect the Leased Space. It is possible that this prospective buyer or other prospective buyers may request additional similar visits. No property of Deeproot will be removed or destroyed during the visits. In addition, no records of Deeproot will be accessed or reviewed. While SDOV believes the contemplated visits do not violate the Freeze Orders entered in this matter (*see* ECF #7, 21, 23), out of an abundance of caution, SDOV requests permission from the Court to access the Leased Space as described in this paragraph.

Unopposed Motion: Counsel for SDOV has conferred with counsel for the SEC and counsel for Defendants and the entity Relief Defendants, who have confirmed that they do not oppose this motion.

CONCLUSION AND PRAYER FOR RELIEF

For the reasons set forth above, SDOV requests permission from the Court to access the Leased Space for the purpose of showing prospective buyers the Leased Space. An agent of SDOV will be present during each visit to ensure that no property of Deeproot is removed.

Dated: November 17, 2021

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/s/ Peter A. Stokes

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*Counsel for Third Party Silicon Drive Office
Venture, LLC*

CERTIFICATE OF CONFERENCE – UNOPPOSED MOTION

I certify that I have conferred with counsel for the SEC and counsel for Defendants and the entity Relief Defendants, who have confirmed that they do not oppose this motion.

/s/ Peter A. Stokes

Peter A. Stokes

CERTIFICATE OF SERVICE

The undersigned certifies that on November 17, 2021, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Peter A. Stokes

Peter A. Stokes